Robert L. Sills (RS 8896) Steven J. Fink (SF 3497) Ryan S. Lester (RL 5603) ORRICK, HERRINGTON & SUTCLIFFE LLP 666 Fifth Avenue New York, New York 10103 Telephone: (212) 506-5000 Facsimile: (212) 506-5151 Attorneys for Plaintiff

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

E.T.I. EURO TELECOM INTERNATIONAL N.V.,

Plaintiff,

-against-

REPUBLIC OF BOLIVIA and EMPRESA NACIONAL DE TELECOMUNICACIONES ENTEL S.A.,

Defendants.

CIVIL ACTION NO.: 08-CV-4247 (LTS)

NOTICE OF MOTION TO CONFIRM ORDER OF ATTACHMENT

PLEASE TAKE NOTICE that upon the Declaration of Robert L. Sills dated May 12, 2008, the exhibits thereto, Plaintiff E.T.I. Euro Telecom International N.V.'s ("ETI")

Memorandum of Law in Support of Its Motion to Confirm Order of Attachment, and all the prior pleadings and proceedings herein, including the Declaration of Franco Bertone dated May 4, 2008, the exhibits thereto, the Declaration of Fabio Incutti dated May 5, 2008, the exhibit thereto, the Declaration of Robert L. Sills dated May 5, 2008 and the exhibits thereto, ETI, by its undersigned counsel, moves this Court for an order, pursuant to Rule 64 of the Federal Rules of Civil Procedure and section 6211(b) of New York's Civil Practice Law and Rules, (a) confirming the Order of Attachment entered by the Court on May 5, 2008, and (b) for such other relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that Defendants and Garnishees shall serve and file papers, if any, in opposition to this motion on counsel for Plaintiff within 10 business days of Plaintiffs' service of this motion, and Plaintiff shall serve and file reply papers, if any, within 3 business days after receipt by Plaintiff's counsel of such papers in opposition, all pursuant to the *Ex Parte* Order of Attachment issued by the Court on May 5, 2008.

PLEASE TAKE FURTHER NOTICE that this motion is returnable before the Hon.

Laura T. Swain, United States District Judge, at the Daniel Patrick Moynihan United States

Courthouse, Courtroom 17C, 500 Pearl Street, New York, New York 10007, 15 business days

after Plaintiff's service of this motion, or at such later date as may be scheduled by the Court.

Dated: New York, New York May 12, 2008

ORRICK, HERRINGTON & SUTCLIFFE LLP

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